

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	CASE No. 2:23-MJ-257
	:	
vs.	:	MAGISTRATE JUDGE
	:	KIMBERLY A. JOLSON
KAH'LIL KIREE LAMONTE WADE	:	
	:	
DEFENDANT.	:	

**JOINT MOTION FOR EXTENSION OF TIME DURING WHICH AN
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and jointly move this Court for a second order extending the time for the return of an Indictment or Information pursuant to 18 U.S.C. § 3161(b) from August 10, 2023, to September 14, 2023. The defendant, Kah'Lil Kiree Lamonte Wade, is aware of his right to the timely filing of an Indictment or Information, afforded under 18 U.S.C. § 3161(b), and hereby waives those rights for the purposes of this motion. The parties believe this additional continuance would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

The United States has provided pre-indictment discovery to defense counsel to examine and review with the defendant, and the parties have entered plea discussions. However, due to the defendant inadvertently being returned to state custody rather than held in federal custody, as well as the travel and court schedules of counsel, discussions about a possible case resolution have been difficult to finalize prior to the time within which an Indictment or Information must be filed

on August 10, 2023. The parties are in agreement that a continuance of time for indictment would best serve the interests of justice and the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

For these reasons, the parties request an extension of the time until September 14, 2023, within which an Indictment or Information may be filed in this case.

Respectfully submitted,

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ORDER

Upon this joint motion of the parties, and for the reasons set forth in the parties' joint motion, the Court hereby finds that there is good cause shown to grant an additional extension of time in which an Indictment or Information must be filed, that the extension would best serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A). Accordingly, the Court hereby GRANTS an extension of these dates until September 14, 2023, where an Indictment or Information will be filed pursuant to 18 U.S.C. § 3161(b).

Date

United States Magistrate Judge